UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
UNITED STATES OF AMERICA	
- against -	10 CR 228 (LTS)
DANIEL BONVENTRE et al.,	NOTICE OF MOTION
Defendants.	

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law,

Daniel R. Bonventre will move this Court at the United States Courthouse, 500 Pearl Street, New

York, New York, at a date and time to be set by the Honorable Laura Taylor Swain, for:

- (1) In Limine relief as set forth in the accompanying memorandum of law;
- (2) An order directing the government to provide certain particulars and exhibits;
- (3) An order severing Mr. Bonventre's trial from that of his co-defendants and severing the tax and ERISA crimes charged in the indictment from the other charges against Mr. Bonventre; and
- (4) Other relief that may be warranted.

Dated: August 30, 2013

___/s/___ Andrew J. Frisch The Law Offices of Andrew J. Frisch 40 Fulton Street, 23rd Floor New York, New York 10038 212-285-8000 afrisch@andrewfrisch.com

Counsel for Daniel Bonventre